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**ORIGINAL**

Vincent A Pepper  
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January 28, 2004

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

**RECEIVED**

JAN 28 2004

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

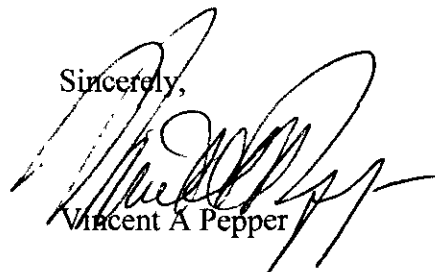
Re: MB Docket No. 03-120  
RM - 10591

Dear Ms. Dortch:

Transmitted herewith on behalf of Ronald C. Meredith, Petitioner in the above-referenced rule making, are an original and four (4) copies of his Reply Comments.

Should any further information be desired in connection with this matter, please communicate with this office.

Sincerely,



Vincent A Pepper

Enclosures

4 copies rec'd OT 4  
121 ABCDE

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of )  
 )  
Amendment of Section 73.202(b) )  
Table of Allotments )  
FM Broadcast Stations )  
(Lake City and Chattanooga, Tennessee) )

MB Docket No. 03-120  
RM – 10591

**RECEIVED**  
**JAN 28 2004**  
**FEDERAL COMMUNICATIONS COMMISSION**  
**OFFICE OF THE SECRETARY**

To: Assistant Chief, Audio Division  
Media Bureau

**REPLY COMMENTS**

COMES NOW, Ronald C. Meredith (“Petitioner”) petitioner in the above-captioned rule making proceeding and by counsel hereby respectfully submits his Reply Comments in response to the Commission’s January 12, 2004 call for public comment on the Counterproposal submitted on behalf of JBD Incorporated (“JBD”), the licensee of station WXJB(FM), Harrogate, Tennessee.<sup>1</sup> While the Counterproposal is mutually exclusive with Petitioner’s request currently being considered to allocate Channel 244A to Lake City, Tennessee, the Counterproposal fails both in that it does not propose a community eligible for allotment and, even if the community were eligible, it fails to meet the Commission’s technical requirements and should be dismissed.

In support thereof it is stated as follows:

1. Comments supporting the Petitioner’s proposed rule making were timely submitted on behalf of Petitioner and Lewis F. Cosby, III earlier in this proceeding. Petitioner hereby incorporates those Comments into these Reply Comments by reference, as they clearly establish that Lake City is a community eligible for and deserving of first local service.

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<sup>1</sup> These Reply Comments are timely filed, as the Federal Communications Commission closed early due to inclement weather on January 27, 2004, and unable to accept filings.

2. In contrast, the Counterproposal proposes the allocation of Channel 244A not to an eligible community, but rather to an area indicated to be Halls Crossroads, Tennessee, which is no more than a neighborhood in the Knoxville suburbs. Attached to these Reply Comments is a Statement prepared by the Petitioner which clearly establishes that Halls Crossroads is not a community deserving of first local service. *See* Statement. Among other things, it illustrates that Halls Crossroads is a small neighborhood that has none of the indicia of being a community that the Commission requires. Halls Crossroads, as pointed out, is neither an incorporated city or even a community designated place, but simply a small geographic area. Generally, a neighborhood or geographic area is not presumed to be a community suitable for allotment purposes absent a strong showing of community indicia. *See* Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88, 100 (1982) (requirement of an allotment to a community is generally satisfied if the community is either incorporated or listed in the U.S. Census). However, JBD has failed to establish a clear nexus between the Counterproposal's cited social and economic organizations and Halls Crossroads (there are no cited governmental organizations). *See* Avon, North Carolina, 14 FCC Rcd 3939 (1999); and Belview, Minnesota, 11 FCC Rcd 12793 (1996).

3. The Statement makes clear that the organizations and businesses discussed in the Counterproposal do not just serve the needs of Halls Crossroads residents, but rather those of the larger Knoxville community. *See* Lupton, Michigan, 11 FCC Rcd 14428 (1996); Pleasant Dale, Nebraska, 14 FCC Rcd 18893 (1999); Kanarraville, Utah, 14 FCC Rcd 15962 (1999); and Littlefield, Arizona, 15 FCC Rcd 10263 (2000) (all noting that it is a critical deficiency where petitioner fails to demonstrate that the organizations and businesses in the proposed community are intended to serve the residents of that community rather than residents in other nearby areas).

The Counterproposal merely recites the existence of a number of businesses (and subdivisions of the larger county government) in the Halls Crossroads area as evidence that Halls Crossroads is a community, without clearly establishing the connection between those businesses and the needs of Halls Crossroads. The Commission has previously rejected claims of community status where a nexus between the political, social and commercial organizations and the community in question has not been shown. *See Pike Road and Ramer, Alabama*, 10 FCC Rcd 10347 (1995). Essentially, the Counterproposal has attempted to borrow the institutions and organizations that serve Knoxville and turn them into entities that are somehow designed to serve only Halls Crossroads. *See Statement at paras 1-4 and 6.*

4. Also included with the Statement are a number of letters from local business owners and elected officials describing Halls Crossroads as a well-served “part of Knoxville.” *See Tab A to Statement.* These same letters also support the need for service to the community of Lake City, Tennessee. The Commission has previously pointed toward the testimony of local residents or similar subjective evidence in evaluating the existence of a community. *See Beacon Broadcasting*, 2 FCC Rcd 3469 (1987), *aff’d*, 2 FCC Rcd 7562 (1987).

5. In sum, it is clear that Halls Crossroads is not a community for allotment purposes. There is no formal government, there are no municipal services supported by Halls Crossroads-specific taxation, no Halls Crossroads-specific civic organizations have been shown to exist, and there is minimal economic activity that is not obviously attributable to the greater Knoxville economy. In 1999, the Commission rejected an allotment petition for an area called Peralta, where it noted that “Peralta has no local government or elected officials, offers no municipal services, has no local media, and no civic or social organizations.” *Grants and Peralta, New Mexico*, 14 FCC Rcd 21446 (1999). Similarly, Halls Crossroads is little more than the

name of a small area with no truly local services, but is instead just a small part of the regional economic powerhouse, Knoxville. Since Halls Crossroads is clearly not a community for allotment purposes, the Counterproposal should be dismissed.

6. The Petitioner has previously submitted, with Petitioner's Reply Comments filed July 28, 2003, a Technical Statement prepared by Clyde Scott, Jr., EME Communications. Petitioner hereby incorporates this Technical Statement by reference to illustrate the Counterproposal's technical deficiencies. For the reasons stated in the Technical Statement, even assuming, *arguendo*, that Halls Crossroads is a community for the purposes of allotment, the JBD Incorporated Counterproposal is not eligible for consideration in this proceeding since, among other problems, the Halls Crossroads Counterproposal does not achieve the required line of sight from the proposed transmitter site to "Hall Crossroads" because of terrain obstruction.

7. Finally, Petitioner has attached a notarized letter ("Letter") that outlines the contents of a number of telephone conversations he had over the summer of 2003 with an individual who identified himself as Mr. Lyle Reynolds. *See* Letter (attached). The letter illustrates what Petitioner believes to be the true motivation behind the Counterproposal – to orchestrate a move-in of a small rural station into the Knoxville Urbanized Area in an attempt to increase the value of the license. *See* Letter (noting that Petitioner was told that Lyle Reynolds "had an agreement to buy WXJB for a greater price only if he was able to move it to Knoxville where it would be sold for millions of dollars of profit"). Clearly, the Counterproposal is not about serving the public interest, but trafficking in licenses for profit

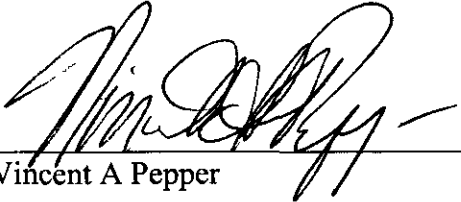

8. Given Hall Crossroads ineligibility for an allotment as outlined in the attached Statement, as well as the shortcomings reflected in the Technical Statement, the Counterproposal should not be entitled to consideration in this proceeding. Furthermore,

considering the clear need of a first local service to Lake City, Tennessee, Channel 244A should be allocated to Lake City, Tennessee as proposed.

Respectfully submitted

RONALD C. MEREDITH

By:

  
\_\_\_\_\_  
Vincent A Pepper  
\_\_\_\_\_  
Mark Blacknell

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tel: (202) 857-4400

Dated: January 28, 2004

Counter Arguments to the eight Tuck factors demonstrating the independence of Halls Crossroads from Knoxville as presented by JBD Incorporated and Arguments for Lake City, Tennessee, Allocation

1 *Extent to which the residents of Halls Crossroads, Tennessee, work in Halls Crossroads.*

First and foremost, the JBD counterproposal asserts the population of Halls, Crossroads, TN, to be 11,683, which was arrived at by adding Census Tracts 62 02, 62.03, and an unknown portion of 64. According to Gretchen Beale of the Knoxville Metropolitan Planning Commission (MPC), what is most commonly referred to as the Halls area is the corner in which 62.01, 62 02, 62 03, and 62 04 intersect which shows a significantly smaller population than estimated by the JBD counterproposal. The area reference by Beale is also used and quoted as fact by the Rand McNally Map Company, showing Halls Crossroads, Tennessee, as a small suburb of the city of Knoxville with a population of 1900 (See Exhibit #1). However, as to the exact boundaries of Halls, and therefore the exact population, Beale said "both are subject to interpretation." Beale continued on to state that Halls is essentially an "ill-defined community," one that has "no boundaries because it is not incorporated." Simply put, there is no known recognition as to what is or what is not Halls; it is not recognized as a distinct entity by the MPC. Furthermore, the JBD counterproposal incorrectly includes the areas known as Powell, Fountain City, and Gibbs Tennessee as part of the "Halls Crossroads."

As to the extent to which the residents of the area known as Halls Crossroads work in Halls, the Profile of General Demographic Characteristics (2000) of Geographic Area: Census Tract 62.02 (See Exhibit #2) shows that of the total population of that tract, 3,701, only 2,912 are old enough for employment status, 926 of which are not in the labor force, and of the total working, 1,910 commute to work, with the mean travel time being 26 minutes. Census Tract 62 03 (See Exhibit #3) shows that of the total population of that tract, 4,482, only 3,590 are old enough for employment status, 1,280 of which are not in the labor force, and of that total working, 2,169 commute to work, with the mean time being 23 minutes. When taking into consideration traffic, speed limits, and travel distances, a commute time of 23-26 minutes provides evidence that these people work in downtown Knoxville or further into the city of Knoxville. Even though there is not an exact location to the area called Halls, these census tracts clearly demonstrate that the majority of those living in North Knoxville/North Knox County must go outside of this area to find gainful employment and therefore do not work in the Halls Crossroads area in which they live.

This assertion is further evidenced by the city of Knoxville, its Mayor, Victor Ashe, and Knoxville's public bus system, KAT. In a press release, City of Knoxville Mayor Victor Ashe made reference to the KAT's service to the Halls area. The city of Knoxville's KAT service provides an AM route from the Halls Crossroads area to Downtown Knoxville, and two PM routes from Downtown Knoxville back to the Halls Crossroads area (See Exhibit #4). The fact that KAT serves commuters who travel from their residences in the Halls Crossroads area to their places of employment in Downtown Knoxville clearly demonstrates the reliance of the Halls Crossroads area on the City of Knoxville for services and employment, and demonstrates the inclusion of the Halls Crossroads area as part of the urbanized Metropolitan Knoxville area.

Lake City is home to a number of businesses and industries. Because of the favorable environment, ready access transportation by truck, rail, or barge, and the work force availability, Lake City is home to some premier national industries, such as Hustler Boat Trailers, Trailmanor

Campers, and Ultra Tech Extrusions, all employing Lake City residents. This shows that the great majority of Lake City residents are employed in Lake City. Also the fact that Lake City boasts its own Chamber of Commerce further proves the labor force which lives in Lake City chooses to do business in, and thus works in, Lake City.

## *2 Newspapers and other media that cover Halls Crossroads' needs and interests.*

The JBD counterproposal cites the *Halls Shopper News* as evidence for this factor. The *Halls Shopper News* is a regional publication that serves Powell, Karns, Fountain City, Maynardville, Union County, Gibbs, Corryton, Copper Ridge/Brickey, and Halls as evidenced by their website (See Exhibit #5). Sales representatives for the *Halls Shopper* describe it as a North Knoxville publication. This fact is further demonstrated when noting the address for the *Halls Shopper*, PO Box 18295, Knoxville, TN 37928. Therefore, this publication is not exclusively for the Halls area but rather the region of North Knoxville/North Knox County. This demonstrates that although this publication includes the area known as Halls Crossroads, it depends on other areas of Knoxville for its content, circulation, and revenue.

Lake City, TN, was home to the Lake City Town Cryer Newspaper for more than 100 years. Lake City is also covered weekly in the *Volunteer Times Newspaper* of Campbell County, TN, and biweekly in *The Courier News* of Clinton, TN. Each publication contains local, community, and business news, classified sections, and advertisements throughout regarding Lake City, TN.

## *3 Community leaders and residents perceive Halls Crossroads as being separate from Knoxville*

*The Knoxville News-Sentinel* views the Halls Crossroads area as North Knoxville and therefore makes no distinction between North Knoxville and Halls Crossroads in its community section of the paper. In fact, an article about Halls middle school students on July 9th was placed in the "North Knox County [news] briefs" section (See Exhibit #12).

Furthermore, the Halls Crossroads area is included in the 4th District of the Knoxville City Council (See Exhibit #6) and District 7 of the Knox County Commission (See Exhibit #7). Without exception, all of the schools in the Halls Crossroads area/District 7 are under the authority of the Knox County School system (See Exhibit #8). Furthermore, schools in the Halls Crossroads area regularly participate in Knoxville City events, such as the 2003 Phone Book Recycling Contest, where Halls Elementary won a monetary prize from the City of Knoxville and was awarded 2nd place (See Exhibit #9).

And while Mary Lou Horner (County Commissioner for 7th District) lives in the Halls area, she also takes part and has served on boards outside of the Halls area, such as President of the Greater Knoxville Beautification Board, the Fountain City Business and Professional Association, and the Northside Community Center, as well as a member of the Knoxville Women's Center (See Exhibit #10). Likewise, co-chair of the 2004 Dogwood Arts Festival, Larry Smith, is cited as being a lifelong Knoxvillean, and he is a member of the Fountain City, Halls, Powell, and Union County Business and Professional Associations. His business, R. Larry Smith & Associates Insurance Agency, is cited as being located in North Knoxville, yet the address, 7119 Afton Drive, is often claimed by some as Halls (See Exhibit #11). These and other community leaders by their affiliations, residences, and places of business demonstrate that there



is no separation from Knoxville. These community leaders participate in events and make decisions that impact the entire City of Knoxville, not simply the area known as Halls Crossroads.

Lake City, TN, however, is its own municipality and has its own police department, fire department, city council, recreation department, and public works department, just to name a few. (Please see letters from Lake City community leaders marked Exhibit A.) Lake City holds its own city elections and participates in Anderson County elections. Lake City, TN, began in the 1800s as one of the most successful coal mining communities in the east Tennessee area. It quickly became known as a vibrant place for employment. In 1872, Coal Creek Academy was built in Lake City, and in 1904, the name became Lake City Elementary School. A new school was built in 1923 and expanded in 1936. Further growth required yet another building for elementary education, built in 1959 and once again expanded in 1965. In the early 1950s, both elementary and middle school education had outgrown their space. This led to the construction of a new high school serving grades 9-12. The population of Lake City schools continues to grow; in 1994 construction and renovations were made, and 20 new classrooms were added. This constant construction and renovating of schools shows Lake City, TN, operates as its own entity. Also, residents employed by the city of Lake City are members of the Political Subdivision Pension Plan, which again demonstrates Lake City's independence. Lake City's independence is further shown by their city-wide events, festivals and celebrations, such as the Lake City 4th of July celebration and fireworks, the city of Lake City's annual Christmas Parade, Car Show, and other city self supported events (See Exhibit B).

*4 Halls Crossroads has its own County Clerk Office branch and its own trash and recycling center.*

It is important to remember that Halls is unincorporated. As Gretchen Beale of the Knoxville Metropolitan Planning Commission stated, "Halls is not independent of Knoxville, it is part of Knoxville." Therefore, the branch of the county clerk office referred to in the JBD counterproposal is not Halls' own but that of Knox County. This is stressed in Knoxville Mayor Victor Ashe's comments in two separate press releases calling upon the citizens of the city of Knoxville and Knox County to approve two City Charter amendments improving pension benefits for uniformed employees. The Mayor also urged the citizens of the City of Knoxville and Knox County to participate in early voting in the State Primary and the County General Election in which one of the voting locations was in the Halls Crossroads area (See Exhibit #13). The Mayor of the City of Knoxville encouraging voters to go to voting locations in the Halls Crossroads area to vote on a matter which concerned each part of the City of Knoxville and all of its employees in and of itself demonstrates that the services located in the area of Halls Crossroads are the city of Knoxville's and/or Knox County's and not that of Halls. Therefore, this branch of the County Clerk's office, as well as the recycling center and other services, is to serve merely as a convenience for citizens in the North Knoxville/North Knox area. The City of Knoxville also puts branch offices in the local shopping malls, such as the East Town Mall/Knoxville Center and West Town Mall. They call it "City Hall at the Mall." It is simply a convenience for the hundreds of thousands of citizens who shop at these locations. Under the assertions made by JBD in their counterproposal, these malls would have criteria to be considered as independent communities simply because the City of Knoxville/Knox County put convenience offices in them.

Lake City, TN, not only has a Clerk's office, but it has a City Clerk. It also has its own police department, fire department, City Hall, recreation department, public library, post office,

Lake City Water and Sewer, Lake City community center, Waste Water Plant, and Public Works Department (See Exhibit C). Additionally, Lake City has its own City Council and Mayor, all elected by the residents of Lake City, TN

*5 Halls Crossroads spans two zip codes and has its own separate listing in the local telephone company directory.*

While the JBD counterproposal asserts the Halls Crossroads area encompasses zip codes 37918 and 37938, when researched through the US Census Bureau and the State of Tennessee, both zip codes are listed as Knoxville, not Halls. Furthermore, Linda Webb of the Circulation/Research Department at the *Knoxville News-Sentinel* stated that "37938 encompassed North Knoxville, including the Halls area." She continued to say that "37918 was closer to the city of Knoxville and mostly contained Fountain City, not Halls". And nearly every listing in the phone book excerpt provided by JBD in their counterproposal is a Knoxville address. Likewise, BellSouth lists all of Halls schools as Knox County public schools with Knoxville addresses (See Exhibit #14). This demonstrates that the Halls Crossroads area is included and part of the urbanized Knoxville Metropolitan area by way of its United States postal zip code references as well as its public school addresses.

Lake City, TN, is located in both Campbell County and Anderson County, Tennessee, and encompasses two zip codes, 37769 and 37714. Lake City is included in both the Anderson County and Campbell County phone books, as the clearly drawn incorporated city borders stretch across both of these counties.

*6 Halls Crossroads has its own commercial establishments and health facilities.*

The establishments listed in the JBD counterproposal all have Knoxville addresses. These businesses are found in all areas of Knoxville, north, south, east, and west. Note the JBD counterproposal states the existence of a Union Planners Bank in the Halls Crossroads area. There is in fact no Union Planners Bank, they may have been referring to the large regional bank of Union Planters, which does have a North Knoxville location. The same applies to the national franchise of Mr. Gatti's pizza in North Knoxville, instead of Mr. Gaddy's, as referenced by the JBD counterproposal. Simply put, each of these businesses are in the northern part of the urbanized Metropolitan City of Knoxville. For instance, Halls Vision Clinic's address is 7105 Afton Drive Knoxville, TN 37918. In exhibit #11, we demonstrated that one of the Knoxville City leaders, Larry Smith, whose business is on 7119 Afton Drive, states that his business is in North Knoxville, not Halls. Mr. Smith should certainly know the difference in North Knoxville and the Halls Crossroads area, as he has been in business at that location in Knoxville for 22 years and is also a member of the Knoxville Metropolitan Planning Commission and many other Knoxville boards and committees. It is obvious that because of the lack of any legal or defined local boundaries, there is no way to state which businesses might or might not be in the Halls Crossroads area. The area referenced by JBD's counterproposal is defined as Knoxville by its zip code and North Knoxville by its residents.

In addition, there appears to be no need for a separate Halls Crossroads area Chamber of Commerce as there is not one. One can thus determine that the Knoxville Area Chamber Partnership, which represents the entire urbanized Knoxville Metropolitan area, is adequate in representing the needs of its members / businesses located in North Knoxville.

Similar to the Knoxville County Clerk branch located in the Halls Crossroads area, the University of Tennessee Medical Center at Knoxville operates at a site known as the Medical Center at Halls. The University of Tennessee is obviously not unique to the Halls Crossroads area but operates across the entire state. And while several organizations use the term "Halls" in their name, this in no way implies independence from Knoxville/Knox county. In fact, in the one page of the Knoxville Phone Book tabbed Halls Crossroads in the JBD counterproposal, there were more than 30 businesses listed. Not one bore the name Halls. This indicates that businesses, churches and other facilities in the area define themselves more so with a Knoxville identity to sustain and promote themselves as opposed to a Halls Crossroads area identity. For instance, in July, 2003 the Knox County Commission is set to approve the purchase of a North Knoxville park that bears the name of Halls Community Park (See Exhibit #15). If the Halls Crossroads area operated independent of Knoxville, it would not receive such funding for its self named park. Just as the parks in the Halls Crossroads area need Knoxville funding to survive, so do the businesses that bear the name of Halls depend on Knoxville for business and to survive.

Lake City, TN, has a great number of businesses, both retail and industrial, so much so that they have their own separate Chamber of Commerce. Lake City is also the home of numerous health and medical facilities, banks and credit unions, and churches. A small example of such establishments include the Lake City Health Care Center, Lake City Family Physicians Center, Lake City Auction Gallery, Lake City Auto Parts, Lake City Napa Auto Parts, Lake City Christian Fellowship, Lake City Church of God, Lake City Family Resource Center, Lake City Hardware, Lake City Health Care, Lake City Texaco, Lake City United Methodist Church, Lake City TV Sales and Service, Lake City Tire Shop, Lake City Auto Mart, First Baptist Church of Lake City, Covenant Life Fellowship of Lake City, and hundreds and hundreds of others (See Exhibit D for a partial listing from the Lake City Chamber of Commerce).

#### *7 Halls Crossroads is a separate and distinct advertising market from Knoxville.*

There is no Halls Crossroads area ADI. There is no separate Halls Crossroads area advertising market. Businesses in the North Knoxville area, that is referred to as Halls Crossroads, use a number of area publications and broadcast facilities to advertise their existence in the North Knoxville market. For instance, Linda Webb of the Circulation/Research Dept at the *Knoxville News-Sentinel* found 8,798 subscriptions to the *Knoxville News-Sentinel* when searching the zip code 37938. Rest assured, businesses in the Halls Crossroads area use the *Knoxville News-Sentinel* to advertise to the hundreds of thousands of Knoxvilleans who receive that paper each day.

The *Halls Shopper News* was used as a reference in the JBD counterproposal as a source to reach "the residents of Halls Crossroads without relying primarily on Knoxville media sources." Please see Exhibit #5 and note the *Halls Shopper News* does not primarily rely on the residents of the Halls Crossroads area. It is a North Knoxville publication that serves Union County, Fountain City, Gibbs, Corryton, Powell, Copper Ridge/Brickey, along with the Halls Crossroads area. It is evident the businesses that advertise with the *Halls Shopper News* are attempting to recruit revenue from all of these North Knoxville areas and not just the Halls Crossroads area. This shows that the Halls Crossroads area is not a separate nor distinct advertising market from Knoxville.

Lake City, TN, is its own separate and distinct advertising market. As stated earlier, Lake City is in both Anderson and Campbell counties (See Exhibit E). Although parts of Anderson

county can be considered in the Knoxville Metro, none of Campbell County is considered as part of any rated metro market. Therefore, Lake City is its own advertising market, currently with no broadcast service.

*8 Halls Crossroads has its own library and public schools and municipal services.*

Again, the facts show the contrary. The Halls Crossroads area is dependent upon Knoxville/Knox county for all its services. All of its schools are part of the Knox County School System, and the Halls Branch Library is part of the Knox County Public Library System. In addition, the Halls Crossroads area has no separate, local government, in fact, the Halls Crossroads area has no elected offices. It is all a part of Knoxville/Knox County. The same is true for its fire and police department. The Halls Crossroads area has no fire department. Knoxville/Knox County provides it. The Halls Crossroads area has no police department. Knoxville/Knox County provides it. The Halls Crossroads area doesn't even have a Chamber of Commerce. All is provided by Knoxville/Knox County. The ambiguous area in question, Halls Crossroads, cannot be considered an entity unto itself because, quite simply, without its inclusion in Knoxville City and Knox County Tennessee, it could not sustain itself.

However, Lake City, TN, is an actual incorporated city and therefore has much more need for this FM broadcast service than the Halls area. Lake City not only has its own library and its own public schools, as referenced earlier, but it also has its own government, public works department, city hall, elected mayor, city council, and other officials, a waste water plant department, a recreation department, Lake City community center, and numerous church and civic organizations. Residents of Lake City also pay city property and sales tax. Therefore, Lake City is its own self governed, self reliant city.

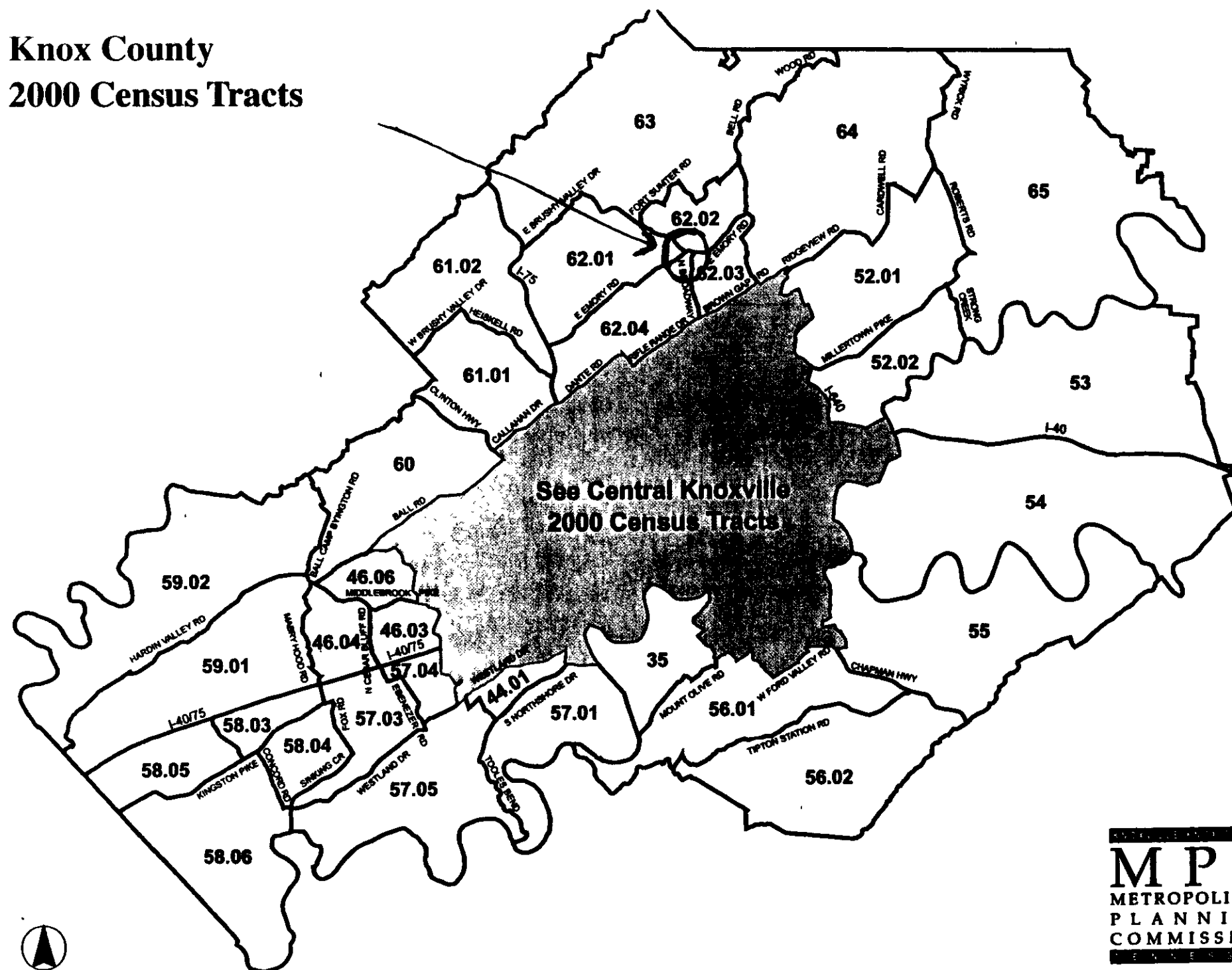
**Conclusion.**

It is in the public interest that Lake City, TN, receive its first local service. It has been shown and proven without question that the Halls / Halls Crossroads area is without question part of the Knoxville Metropolitan area and is solely reliant on Knoxville for its existence. Lake City, TN, on the other hand, is absolutely independent of any other city or community, and functions independently with its own government, police department, public works department, etc. The citizens of Lake City need this broadcast service much more than the citizens of Knoxville need another broadcast facility.





# Knox County 2000 Census Tracts



**M P C**  
METROPOLITAN  
PLANNING  
COMMISSION



Subj: FW: Maps, Directions and Road Construction  
Date: 7/16/03 4:09:20 PM Eastern Daylight Time  
From: CONSUMERAFFAIRS@RandMcNally.com (CONSUMERAFFAIRS)  
To: egrant1899@aol.com ('egrant1899@aol.com')

Dear EJ,

Thank you for taking the time to contact Rand McNally. Our 2001, 2002, and 2003 Road Atlases show that the population of Halls Crossroads, TN is 1900. This data is stated as being from the 2000 US Census data.

Thanks again for your interest in Rand McNally.

Kind regards,

Jamie  
Consumer Affairs

-----Original Message-----

From: Travel Team  
Sent: Wednesday, July 16, 2003 2:35 PM  
To: CONSUMERAFFAIRS  
Subject: FW: Maps, Directions and Road Construction

-----Original Message-----

From: egrant1899@aol.com [mailto:egrant1899@aol.com]  
Sent: Wednesday, July 16, 2003 2:25 PM  
To: travelteam@randmcnally.com  
Subject: Maps, Directions and Road Construction

First Name: EJ  
Last Name: Grant  
Email Address: egrant1899@aol.com  
Email Consent: No  
Subscriber type: Guest  
Browser: Mozilla/4.0 (compatible; MSIE 5.0; AOL 5.0; Windows 98;  
DigExt)  
Session Id: @@@@0910418434.1058383017@@@@  
Kind of error:

Other error

Problem Location:

City: Halls Crossroads

State: Tennessee

ZIP code:

Description: You have listed in your atlas an area in East Tennessee, north of Knoxville, named Halls Crossroads, showing a population of 2,100 people and list the 2000 census or latest available estimates as your source.



However, the US Census does not have that information, the state of TN does not have that information, and the Knox County/City government does not have that information. I have been told that Halls Crossroads is a bedroom suburb of Knoxville with no legal boundaries and therefore no specific population count. Would you be so kind as to tell me where you came up with your population figures. Love your product. Thank you so much for your time.

EJ Grant

\*\*\*\*\*

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\*\*\*\*\*

----- Headers -----

Return-Path: <CONSUMERAFFAIRS@RandMcNally.com>

Received: from rly-xn05.mx.aol.com (rly-xn05.mail.aol.com [172.20.83.138]) by air-xn03.mail.aol.com (v94.1) with ESMTP id MAILINXN34-64c3f15b0e5162; Wed, 16 Jul 2003 16:09:20 -0400

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Received: from no.name available by [208.220.100.240]

via smtpd (for xn.mx.aol.com [64.12.138.152]) with ESMTP; Wed, 16 Jul 2003 15:09:09 -0500

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id <GDG8JJH4>, Wed, 16 Jul 2003 15:09:05 -0500

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Subject: FW: Maps, Directions and Road Construction

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**PROFILE OF GENERAL DEMOGRAPHIC CHARACTERISTICS: 2000**

Geographic Area: Census Tract 62.02

<b>Total population</b>	<b>3,701</b>	<b>GROUP QUARTERS</b>	
<b>SEX AND AGE</b>		<b>Total population in group quarters</b>	<b>0</b>
Male	1,792	Institutionalized	0
Female	1,909	Correctional institutions	0
		Nursing homes	0
Under 5 years	198	Noninstitutionalized	0
5 to 9 years	238	College (incl college quarters off campus)	0
10 to 14 years	298	Military quarters	0
15 to 19 years	277	Other (Institutionalized and Noninstitutionalized)	0
20 to 24 years	148		
25 to 34 years	460	<b>HOUSEHOLD BY TYPE</b>	
35 to 44 years	666	<b>Total households</b>	<b>1,407</b>
45 to 54 years	560	Family households (families)	1,139
55 to 59 years	236	With own children under 18 years	535
60 to 64 years	169	Married-couple family	989
65 to 74 years	289	With own children under 18 years	456
75 to 84 years	129	Female householder, no husband present	111
85 years and over	33	With own children under 18 years	57
Median age (years)	38.5	Male householder, no wife present	39
		With own children under 18 years	22
18 years and over	2,772	Nonfamily households	268
21 years and over	2,654	Householder living alone	244
62 years and over	544	Householder 65 years and over, living alone	98
65 years and over	451		
		Unmarried-partner households	22
5 to 10 years	297	Households with individuals under 18 years	562
11 to 13 years	176	Households with individuals 65 years and over	322
14 to 18 years	304		
<b>RACE</b>		Average household size	2.63
One race	3,663	Average family size	2.96
White	3,626	<b>HOUSING OCCUPANCY</b>	
Black or African American	3	<b>Total housing units</b>	<b>1,489</b>
American Indian and Alaska Native	8	Occupied housing units	1,407
Asian	16	Vacant housing units	82
Native Hawaiian/Other Pac. Islander	2	For seasonal, recreational, occasional use	3
Some other race	8		
Two or more races	38	Vacancy rate (percent)	5.5
<b>HISPANIC OR LATINO</b>		<b>HOUSING TENURE</b>	
Hispanic or Latino (of any race)	20	<b>Occupied housing units</b>	<b>1,407</b>
Not Hispanic or Latino	3,681	Owner-occupied housing units	1,239
		Renter-occupied housing units	168
		Average household size of owner-occupied units	2.66
		Average household size of renter-occupied units	2.40

Compiled by the Knoxville/Knox County Metropolitan Planning Commission, August 2001

Source: U.S. Census Bureau, 2000 Census of Population and Housing Summary File 1

# **PROFILE OF SELECTED SOCIAL CHARACTERISTICS: 2000**

Geographic Area Census Tract 62.02

<b>SCHOOL ENROLLMENT</b>		<b>RESIDENCE IN 1995</b>	
<b>Population 3 years and over enrolled in school</b>		<b>Population 5 years and over</b>	<b>3,500</b>
Nursery school, preschool	56	Same house in 1995	2,029
Kindergarten	62	Different house in the U S in 1995	1,394
Elementary school (grades 1-8)	404	Same county	977
High school (grades 9-12)	289	Different county	417
College or graduate school	137	Same state	268
		Different state	149
		Elsewhere in 1995	77
<b>EDUCATIONAL ATTAINMENT</b>		<b>NATIVITY AND PLACE OF BIRTH</b>	
<b>Population 25 years and over</b>		<b>Total population</b>	<b>3,701</b>
Less than 9th grade	82	Native	3,657
9th to 12th grade, no diploma	163	Born in United States	3,633
High school graduate (includes GED)	861	State of residence	2,778
Some college, no degree	798	Different state	855
Associate degree	227	Born outside United States	24
Bachelor's degree	318	Foreign born	44
Graduate or professional degree	102	Entered 1990 to March 2000	0
Percent high school graduate or higher	90 4	Naturalized citizen	37
Percent bachelor's degree or higher	16 5	Not a citizen	7
<b>MARITAL STATUS</b>		<b>REGION OF BIRTH OF FOREIGN BORN</b>	
<b>Population 15 years and over</b>		<b>Total (excluding born at sea)</b>	<b>44</b>
Never married	483	Europe	7
Now married (not separated)	2,088	Asia	0
Separated	30	Africa	0
Widowed	138	Oceania	0
Female	125	Latin America	6
Divorced	233	Northern America	31
Female	130		
<b>DISABILITY STATUS OF THE CIVILIAN NONINSTITUTIONALIZED POPULATION</b>		<b>LANGUAGE SPOKEN AT HOME</b>	
<b>Population 5 to 20 years</b>		<b>Population 5 years and over</b>	<b>3,500</b>
With a disability	34	English only	3,459
		Language other than English	41
<b>Population 21 to 64 years</b>	<b>2,201</b>	Spanish	28
With a disability	325	Other Indo-European languages	6
Percent employed	79 4	Asian and Pacific Island languages	0
No disability	1,876	Other	7
Percent employed	81 4		
<b>Population 65 years and over</b>	<b>450</b>		
With a disability	171		

**Geographic Area.** Census Tract 62.02

Compiled by the Knoxville/Knox County Metropolitan Planning Commission, September 2002  
Source: U.S. Census Bureau, 2000 Census of Population and Housing Summary File 3

**PROFILE OF SELECTED HOUSING CHARACTERISTICS: 2000**

Geographic Area. Census Tract 62 02

<b>Total housing units</b>	<b>1,489</b>	<b>Occupied housing units</b>	<b>1,407</b>
<b>UNITS IN STRUCTURE</b>		<b>HOUSE HEATING FUEL</b>	
1-unit, detached	1,328	Utility gas	665
1-unit, attached	57	Bottled, tank, or LP gas	6
2 units	50	Electricity	705
3 or 4 units	0	Fuel oil, kerosene, etc	0
5 to 9 units	0	Coal or coke	7
10 to 19 units	0	Wood	24
20 or more units	0	Solar energy	0
Mobile home	54	Other fuel	0
Boat, RV, van, etc	0	No fuel used	0
<b>YEAR STRUCTURE BUILT</b>		<b>OCCUPANTS PER ROOM</b>	
1999 to March 2000	57	1 00 or less	1,387
1995 to 1998	233	1 01 to 1 50	11
1990 to 1994	247	1 51 or more	9
1980 to 1989	237		
1970 to 1979	430	<b>Specified owner-occupied units</b>	<b>1,136</b>
1960 to 1969	176	<b>VALUE</b>	
1940 to 1959	86	Less than \$50,000	15
1939 or earlier	23	\$50,000 to \$99,999	400
Median, owner-occupied (year)	1981	\$100,000 to \$149,999	513
Median, renter-occupied (year)	1991	\$150,000 to \$199,999	114
<b>ROOMS</b>		\$200,000 to \$299,999	82
1 room	9	\$300,000 to \$499,999	12
2 rooms	6	\$500,000 to \$999,999	0
3 rooms	9	\$1,000,000 or more	0
4 rooms	97	Median (dollars)	111,200
5 rooms	287	<b>MORTGAGE STATUS AND SELECTED</b>	
6 rooms	369	<b>MONTHLY OWNER COSTS</b>	
7 rooms	355	With a mortgage	813
8 rooms	164	Less than \$300	7
9 or more rooms	193	\$300 to \$499	19
Median (rooms)	6 4	\$500 to \$699	97
<b>Occupied housing units</b>	<b>1,407</b>	\$700 to \$999	330
<b>YEAR HOUSEHOLDER MOVED INTO UNIT</b>		\$1,000 to \$1,499	303
1999 to March 2000	255	\$1,500 to \$1,999	51
1995 to 1998	319	\$2,000 or more	6
1990 to 1994	293	Not mortgaged	323
1980 to 1989	256	<b>Specified renter-occupied units</b>	<b>170</b>
1970 to 1979	206	<b>GROSS RENT</b>	
1969 or earlier	78	Less than \$200	9
<b>VEHICLES AVAILABLE</b>		\$200 to \$299	6
None	33	\$300 to \$499	41
1	324	\$500 to \$749	67
2	680	\$750 to \$999	17
3 or more	370	\$1,000 to \$1,499	12
Vehicles per household	2 1	\$1,500 or more	0
<b>SELECTED CHARACTERISTICS</b>		No cash rent	18
Lacking complete plumbing facilities	0	Median (dollars)	579
Lacking complete kitchen facilities	0		
No telephone service	6		

Compiled by the Knoxville/Knox County Metropolitan Planning Commission, September 2002

Source U S Census Bureau, 2000 Census of Population and Housing Summary File 3



# **PROFILE OF GENERAL DEMOGRAPHIC CHARACTERISTICS: 2000**

Geographic Area. Census Tract 62.03

<b>Total population</b>	<b>4,482</b>	<b>GROUP QUARTERS</b>	
<b>SEX AND AGE</b>		<b>Total population in group quarters</b>	<b>2</b>
Male	2,084	Institutionalized	0
Female	2,398	Correctional institutions	0
		Nursing homes	0
Under 5 years	288	Noninstitutionalized	2
5 to 9 years	271	College (incl college quarters off campus)	0
10 to 14 years	273	Military quarters	0
15 to 19 years	276	Other (Institutionalized and Noninstitutionalized)	2
20 to 24 years	267		
25 to 34 years	618	<b>HOUSEHOLD BY TYPE</b>	
35 to 44 years	744	<b>Total households</b>	<b>1,925</b>
45 to 54 years	614	Family households (families)	1,303
55 to 59 years	228	With own children under 18 years	569
60 to 64 years	240	Married-couple family	1,058
65 to 74 years	363	With own children under 18 years	433
75 to 84 years	234	Female householder, no husband present	189
85 years and over	66	With own children under 18 years	104
		Male householder, no wife present	56
Median age (years)	38.1	With own children under 18 years	32
18 years and over	3,474	Nonfamily households	622
21 years and over	3,330	Householder living alone	562
62 years and over	792	Householder 65 years and over, living alone	252
65 years and over	663		
		Unmarried-partner households	66
5 to 10 years	322		
11 to 13 years	161	Households with individuals under 18 years	612
14 to 18 years	280	Households with individuals 65 years and over	521
<b>RACE</b>		Average household size	2.33
One race	4,460	Average family size	2.87
White	4,402	<b>HOUSING OCCUPANCY</b>	
Black or African American	14	<b>Total housing units</b>	<b>2,020</b>
American Indian and Alaska Native	8	Occupied housing units	1,925
Asian	21	Vacant housing units	95
Native Hawaiian/Other Pac. Islander	1	For seasonal, recreational, occasional use	2
Some other race	14		
Two or more races	22	Vacancy rate (percent)	4.7
<b>HISPANIC OR LATINO</b>		<b>HOUSING TENURE</b>	
Hispanic or Latino (of any race)	40	<b>Occupied housing units</b>	<b>1,925</b>
Not Hispanic or Latino	4,442	Owner-occupied housing units	1,356
		Renter-occupied housing units	569
		Average household size of owner-occupied units	2.50
		Average household size of renter-occupied units	1.92

Compiled by the Knoxville/Knox County Metropolitan Planning Commission, August 2001

Source: U.S. Census Bureau, 2000 Census of Population and Housing: Summary File 1



**PROFILE OF SELECTED SOCIAL CHARACTERISTICS: 2000**

Geographic Area: Census Tract 62 03

**SCHOOL ENROLLMENT**

<b>Population 3 years and over enrolled in school</b>	<b>997</b>
Nursery school, preschool	41
Kindergarten	52
Elementary school (grades 1-8)	465
High school (grades 9-12)	233
College or graduate school	206

**EDUCATIONAL ATTAINMENT**

<b>Population 25 years and over</b>	<b>3,116</b>
Less than 9th grade	195
9th to 12th grade, no diploma	337
High school graduate (includes GED)	1,217
Some college, no degree	709
Associate degree	231
Bachelor's degree	344
Graduate or professional degree	83
Percent high school graduate or higher	82.9
Percent bachelor's degree or higher	13.7

**MARITAL STATUS**

<b>Population 15 years and over</b>	<b>3,650</b>
Never married	697
Now married (not separated)	2,231
Separated	21
Widowed	203
Female	181
Divorced	498
Female	325

**DISABILITY STATUS OF THE CIVILIAN NONINSTITUTIONALIZED POPULATION**

<b>Population 5 to 20 years</b>	<b>884</b>
With a disability	145
<b>Population 21 to 64 years</b>	<b>2,659</b>
With a disability	616
Percent employed	65.6
No disability	2,043
Percent employed	77.5
<b>Population 65 years and over</b>	<b>663</b>
With a disability	296

**RESIDENCE IN 1995**

<b>Population 5 years and over</b>	<b>4,206</b>
Same house in 1995	2,497
Different house in the U.S. in 1995	1,690
Same county	1,034
Different county	656
Same state	307
Different state	349
Elsewhere in 1995	19

**NATIVITY AND PLACE OF BIRTH**

<b>Total population</b>	<b>4,482</b>
Native	4,450
Born in United States	4,443
State of residence	3,348
Different state	1,095
Born outside United States	7
Foreign born	32
Entered 1990 to March 2000	6
Naturalized citizen	14
Not a citizen	18

**REGION OF BIRTH OF FOREIGN BORN**

<b>Total (excluding born at sea)</b>	<b>32</b>
Europe	13
Asia	14
Africa	0
Oceania	0
Latin America	0
Northern America	5

**LANGUAGE SPOKEN AT HOME**

<b>Population 5 years and over</b>	<b>4,206</b>
English only	4,039
Language other than English	167
Spanish	91
Other Indo-European languages	62
Asian and Pacific Island languages	14
Other	0

## Geographic Area: Census Tract 62.03

Compiled by the Knoxville/Knox County Metropolitan Planning Commission, September 2002  
Source: U.S. Census Bureau, 2000 Census of Population and Housing: Summary File 3

**PROFILE OF SELECTED HOUSING CHARACTERISTICS: 2000**

Geographic Area: Census Tract 62.03

<b>Total housing units</b>	<b>2,020</b>	<b>Occupied housing units</b>	<b>1,925</b>
<b>UNITS IN STRUCTURE</b>		<b>HOUSE HEATING FUEL</b>	
1-unit, detached	1,326	Utility gas	624
1-unit, attached	125	Bottled, tank, or LP gas	13
2 units	80	Electricity	1,253
3 or 4 units	78	Fuel oil, kerosene, etc	7
5 to 9 units	116	Coal or coke	6
10 to 19 units	158	Wood	6
20 or more units	93	Solar energy	0
Mobile home	44	Other fuel	0
Boat, RV, van, etc	0	No fuel used	16
<b>YEAR STRUCTURE BUILT</b>		<b>OCCUPANTS PER ROOM</b>	
1999 to March 2000	55	1 00 or less	1,911
1995 to 1998	146	1 01 to 1 50	14
1990 to 1994	220	1 51 or more	0
1980 to 1989	500		
1970 to 1979	498	<b>Specified owner-occupied units</b>	<b>1,238</b>
1960 to 1969	425	<b>VALUE</b>	
1940 to 1959	145	Less than \$50,000	6
1939 or earlier	31	\$50,000 to \$99,999	886
Median, owner-occupied (year)	1977	\$100,000 to \$149,999	239
Median, renter-occupied (year)	1981	\$150,000 to \$199,999	89
<b>ROOMS</b>		\$200,000 to \$299,999	12
1 room	6	\$300,000 to \$499,999	6
2 rooms	14	\$500,000 to \$999,999	0
3 rooms	241	\$1,000,000 or more	0
4 rooms	259	Median (dollars)	88,200
5 rooms	559	<b>MORTGAGE STATUS AND SELECTED</b>	
6 rooms	434	<b>MONTHLY OWNER COSTS</b>	
7 rooms	323	With a mortgage	839
8 rooms	100	Less than \$300	6
9 or more rooms	84	\$300 to \$499	47
Median (rooms)	5 4	\$500 to \$699	206
<b>Occupied housing units</b>	<b>1,925</b>	\$700 to \$999	354
<b>YEAR HOUSEHOLDER MOVED INTO UNIT</b>		\$1,000 to \$1,499	199
1999 to March 2000	407	\$1,500 to \$1,999	27
1995 to 1998	497	\$2,000 or more	0
1990 to 1994	297	Not mortgaged	399
1980 to 1989	320		
1970 to 1979	220	<b>Specified renter-occupied units</b>	<b>568</b>
1969 or earlier	184	<b>GROSS RENT</b>	
<b>VEHICLES AVAILABLE</b>		Less than \$200	128
None	134	\$200 to \$299	26
1	609	\$300 to \$499	194
2	830	\$500 to \$749	128
3 or more	352	\$750 to \$999	56
Vehicles per household	1 8	\$1,000 to \$1,499	8
<b>SELECTED CHARACTERISTICS</b>		\$1,500 or more	0
Lacking complete plumbing facilities	6	No cash rent	28
Lacking complete kitchen facilities	6	Median (dollars)	424
No telephone service	8		

Compiled by the Knoxville/Knox County Metropolitan Planning Commission, September 2002

Source U S Census Bureau, 2000 Census of Population and Housing Summary File 3